



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 15, 2022

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Parnas*, S1 19 Cr. 725 (JPO)

Dear Judge Oetken:

The Government respectfully submits this motion to exclude time under the Speedy Trial Act with respect to Count Seven of the S1 Indictment against defendant Lev Parnas. The Court's prior exclusion of time expires today. (*See* Dkt. 303). The defendant has requested a hearing at which he intends to plead guilty to Count Seven (*see* Dkt. 309), but a date for that hearing has not yet been docketed. The Government therefore moves to exclude time under § 3161(h)(7) until such date as the Court sets for Parnas's change-of-plea hearing, so that the parties and the Court may complete the contemplated non-trial resolution of Count Seven. Counsel for the defendant has previously indicated to the Government that Parnas consents to the exclusion of time.

Respectfully submitted,

Damian Williams
United States Attorney for the
Southern District of New York

By: _____ /s/
Aline R. Flodr
Nicolas Roos
Hagan Scotten
Assistant United States Attorneys
(212) 637-2421

Cc: Counsel for all defendants (by ECF)